

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Qwest Communications International, Inc.)
) WC Docket No. 02-148
Consolidated Application for Authority to Provide)
In-Region, InterLATA Services in Colorado, Idaho,)
Iowa, Nebraska, and North Dakota)
_____)

**DECLARATION OF GEOFFREY NIELSON
ON BEHALF OF WORLDCom, INC.**

Based on my personal knowledge and on information learned in the course of my duties, I, Geoffrey Nielson, declare as follows:

1. My name is Geoffrey Nielson. I have been working in the DSL wholesale business for 2 years. Prior to joining WorldCom, Inc., I was the provisioning Process Manager for Rhythms NetConnections, Inc. I have been working at WorldCom Inc., since WorldCom Inc. purchased Rhythms NetConnections, Inc., in December 2001. I am Senior Staff Specialist III in the DSL Operations group and have responsibility for all DSL service delivery processes and systems. I have 3 years experience with process and system integrations with high-tech companies internationally and in the Western United States.

2. WorldCom provides DSL service to businesses and ISPs in Colorado through line-sharing arrangements with Qwest. WorldCom's DSL business requires WorldCom to interface with Qwest and access Qwest's systems and databases in order to pre-qualify,

order, and maintain the loops required to provide DSL service. Without access to Qwest's pre-ordering systems, for example, we would not be able to tell whether a particular loop is qualified for DSL. WorldCom relies on Qwest to provide status-updates on our orders by returning timely and accurate order completion notices or rejects followed by provisioning completion notifications.

Qwest Does Not Provide All Pertinent Loop Qualification and Loop Make-up Information

3. WorldCom is not gaining access to all the relevant loop makeup information that is available in Qwest's network. When WorldCom queries Qwest's loop qualification database using Qwest's IMA/EDI loop make-up tool, we do not always receive all pertinent information. For example, WorldCom may perform a query and find that fiber exists in the loop, in which case we are unable to provide DSL service to that customer. Yet, we are not told that a redundant copper facility over which we could provide that customer DSL service is available. Although Qwest suggests that it has populated its database to include spare copper facilities, it has not been WorldCom's experience that this type of information is actually available. WorldCom thus has had to unnecessarily reject customers' orders for DSL service simply because we have not been provided all relevant loop qualification information.

Qwest Improperly Issues a SOC Before Completing the DSL Order

4. WorldCom has experienced problems in Colorado with the accuracy of Qwest's Service Order Completions (SOC) for its DSL line sharing orders. For example, WorldCom received a SOC for certain DSL line sharing orders, but then a customer complaint revealed that Qwest had not yet completed the order. Discussions with the Qwest central office technician handling the orders revealed that SOC's may be

transmitted electronically to a CLEC regardless of whether work actually has been completed. A SOC should not be transmitted until the work actually has been completed in the central office. Prematurely issuing SOCs creates customer-impacting issues for WorldCom because WorldCom has been lead to believe – and informed its accordingly -- that service will be turned up on a certain date. Customers are dissatisfied with WorldCom when they do not receive service on the day promised.

Qwest Fails to Provide Accurate Channel Facility Assignment Information

5. WorldCom has discovered that Qwest's Channel Facility Assignment (CFA) inventory in a few of its central offices in Colorado is not accurate and requires updating. CFAs are the connections between WorldCom's collocation site and the ILEC's network. Qwest provides to WorldCom a list of available CFAs for each central office, so that WorldCom knows which CFAs it can use to offer service to end-users. Because Qwest has not provided WorldCom with accurate CFA information, orders are automatically rejected with the error message "Invalid CFA," even though we used the assignment that we were given by Qwest. WorldCom must receive assurance that all central office wiring is accurate and that the appropriate information has been updated in Qwest's CFA inventory system in order to provision DSL to its customers.

6. WorldCom has been making requests to Qwest to update its systems, but in some cases it has taken up to 96 hours to receive updated and valid CFAs, during which time our orders are rejecting. WorldCom has asked Qwest to re-certify certain central offices to ensure that it has completed all necessary work related to providing accurate CFAs. In April of this year, 10 central offices in Colorado were re-certified, and of those 10, seven required that Qwest update its CFA system. Of the seven requiring

updating, five are still incorrect. Until the CFAs in these central offices are accurate,
DSL orders placed by WorldCom run the risk of being rejected.

I declare under penalty of perjury that the foregoing is true and correct. Executed
on July 3, 2002.

Geoffrey Nielson